

CCC-84600

GMD/gh

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEVONNE REED,)		
)		
Plaintiff,)	Case No.	09-CV-5581
v.)		
)	JUDGE JOAN B. GOTTSCHALL	
)		
OFFICER FRANK SARABIA #14335, and)	MAGISTRATE JUDGE	
OFFICER J.E. WRIGLEY #7179)	MICHAEL T. MASON	
)		
Defendants.)		

MOTION TO DISMISS PURSUANT TO STIPULATION

NOW COME the Defendants OFFICER FRANK SARABIA and OFFICER J.E. WRIGLEY, by and through their attorneys, Gerald M. Dombrowski of Sanchez Daniels & Hoffman LLP, and hereby move this Honorable Court for entry of an order dismissing this cause with prejudice. In support of said motion, defendant states as follows:

1. The Plaintiff Devonne Reed, through counsel, and Defendants Frank Sarabia and J.E. Wrigley, through their counsel, have engaged in settlement negotiations, in good faith and at arm's length.

2. The parties have come to an agreement that resolves all issues in this case.

3. The parties have agreed to dismiss this case with prejudice pursuant to settlement.

(See attached executed Stipulation to Dismiss incorporated herein as Exhibit A.)

4. The parties request that this Court retain jurisdiction to enforce all settlement provisions.

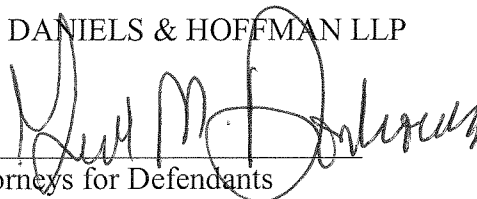
WHEREFORE, in accordance with the aforesaid Stipulation, the parties hereto request entry of an order dismissing this matter with prejudice, and without costs.

Respectfully submitted,

SANCHEZ DANIELS & HOFFMAN LLP

By: _____

Attorneys for Defendants

A handwritten signature in black ink, appearing to read "Gerald M. Dombrowski", is written over a horizontal line. The signature is fluid and cursive.

Gerald M. Dombrowski #06210375
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